

Cynthia Z. Levin, Esq.  
Law Offices of Todd M. Friedman, P.C.  
1150 First Avenue, Suite 501  
King of Prussia, PA 19406  
Phone: 888-595-9111 ext 618  
Fax: 866 633-0228  
[clevin@attorneysforconsumer.com](mailto:clevin@attorneysforconsumer.com)  
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

## I. INTRODUCTION

1. This is an action for damages brought by an individual consumer for Defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.* (hereinafter "FDCPA"), which prohibit debt collectors from engaging in abusive, deceptive, and unfair practices.

## **II. JURISDICTION**

2. Jurisdiction of this Court arises under 15 U.S.C. §1692k (d).

### III. PARTIES

3. Plaintiff, Alice Richards-Keating (“Plaintiff”), is a natural person residing in Lackawanna county in the state of Pennsylvania, and is a “consumer” as defined by the FDCPA, 15 U.S.C. §1692a(3).

4. At all relevant times herein, Defendant, Sentry Credit, Inc., (“Defendant”) was a company engaged, by use of the mails and telephone, in the business of collecting a debt from Plaintiff which qualifies as a “debt,” as defined by 15 U.S.C. §1692a(5). Defendant regularly attempts to collect debts alleged to be due another, and therefore is a “debt collector” as defined by the FDCPA, 15 U.S.C. §1692a(6).

#### **IV. FACTUAL ALLEGATIONS**

5. At various and multiple times prior to the filing of the instant complaint, including within the one year preceding the filing of this complaint, Defendant contacted Plaintiff in an attempt to collect an alleged outstanding debt.

6. In August 2012, Defendant contacted Plaintiff's brother, a third party to this action, at (570) 558-9053, for purposes beyond obtaining Plaintiff's location information.

7. Defendant contacted Plaintiff's brother, a third party to this action, at (570) 558-9053, disclosing the existence of an alleged debt owed by Plaintiff and the identity of Defendant without being expressly requested.

1       8.     Defendant contacted Plaintiff's brother, a third party to this action, at  
2 (570) 558-9053, more than once in connection with an attempt to collect an  
3 alleged debt.

5       9.     Defendant's conduct violated the FDCPA in multiple ways,  
6 including but not limited to:

- 8           a) In connection with an attempt to collect an alleged  
9            debt from Plaintiff, contacting a third party for  
10          purposes other than obtaining location information  
11         (§1692b & §1692c(b));  
12          b) In connection with an attempt to collect an alleged  
13         debt from Plaintiff, providing the identity of  
14         Defendant to a third party without such information  
15         being expressly requested (§1692b(1) & §1692c(b));  
16          c) Disclosing to a third party the existence of the debt  
17         allegedly owed by Plaintiff (§1692b(2) &  
18         §1692c(b));  
19          d) Communicating with a single third party more than  
20         once in connection with an attempt to collect an  
21         alleged debt from Plaintiff (§1692b(3) & §1692c(b)).

22       10. As a result of the above violations of the FDCPA Plaintiff suffered  
23 and continues to suffer injury to Plaintiff's feelings, personal humiliation,  
24 embarrassment, mental anguish and emotional distress, and Defendant is liable to  
25 Plaintiff for Plaintiff's actual damages, statutory damages, and costs and  
26 attorney's fees.  
27  
28

1                   **COUNT I: VIOLATION OF FAIR DEBT**  
2                   **COLLECTION PRACTICES ACT**

3         11. Plaintiff reincorporates by reference all of the preceding paragraphs.  
4

5                   **PRAYER FOR RELIEF**

6         WHEREFORE, Plaintiff respectfully prays that judgment be entered  
7         against the Defendant for the following:  
8

9                   A. Actual damages;  
10                  B. Statutory damages;  
11                  C. Costs and reasonable attorney's fees; and  
12                  D. For such other and further relief as may be just and proper.

13                   **PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY**  
14

15         Respectfully submitted this 15th day of February 2013

16                   By: /s/ Cynthia Z. Levin  
17                   Cynthia Z. Levin, Esq.  
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